

and foreign commerce to knowingly persuade, induce, entice, and coerce Minor Victim 1, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense, namely, Sexual Exploitation of a Minor, a violation of Title 18, Section 2251.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

Between in or about June 2020, through on or about April 27, 2021, in the Middle District and elsewhere, **JUSTIN D. CARROLL** did, by means of interstate commerce, knowingly transfer obscene material to Minor Victim 1, an individual who had not attained the age of 16 years, knowing that Minor Victim 1 had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

Between in or about June 2020, through in and about April 27, 2021, in the Middle District of Tennessee and elsewhere, **JUSTIN D. CARROLL** did knowingly receive child pornography of Minor Victim 2, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and that has been shipped and transported using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

Between in or or about June 2020, through on or about April 27, 2021, in the Middle District of Tennessee and elsewhere, **JUSTIN D. CARROLL** did use a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce Minor Victim 2, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense, namely, Receipt of Child Pornography, which was a criminal offense under 18 U.S.C. § 2252A(a)(2).

In violation of Title 18, United States Code, Section 2422(b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

Between in or about June 2020, through on or about April 27, 2021, in the Middle District and elsewhere, **JUSTIN D. CARROLL** did, by means of interstate commerce, knowingly transfer obscene material to Minor Victim 2, an individual who had not attained the age of 16 years, knowing that Minor Victim 1 had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

Between in or about June 2020, through in and about April 27, 2021, in the Middle District of Tennessee and elsewhere, **JUSTIN D. CARROLL** did knowingly receive child pornography of Minor Victim 3, as defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and that has been shipped and transported using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

Between in or about June 2020, through on or about April 27, 2021, in the Middle District of Tennessee and elsewhere, **JUSTIN D. CARROLL** did use a facility and means or interstate and foreign commerce to knowingly persuade, induce, entice, and coerce Minor Victim 3, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense, namely, Receipt of Child Pornography, which was a criminal offense under 18 U.S.C. § 2252A(a)(2).

In violation of Title 18, United States Code, Section 2422(b).

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

Between in or about June 2020, through on or about April 27, 2021, in the Middle District and elsewhere, **JUSTIN D. CARROLL** did, by means of interstate commerce, knowingly transfer obscene material to Minor Victim 3, an individual who had not attained the age of 16 years, knowing that Minor Victim 1 had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER CHARGES:

1. The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth in support of this forfeiture.

2. Upon conviction of one or more of the offenses alleged in Counts One through Nine of this Superseding Indictment, **JUSTIN D. CARROLL** shall forfeit to the United States, pursuant to 18 U.S.C. §§ 2253(a) and 1467:

- (1) any visual depiction described in section 2251 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of the statute of offense.
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s), or a money judgment representing such gross profits or other proceeds; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property.
- (4) any obscene material produced, transported, mailed, shipped, or received in the offense.

Any electronic devices seized from **JUSTIN D. CARROLL** on or about April 26, 2021, or April 27, 2021, including, but not limited to, the following: a Samsung Galaxy Note 9 cellular phone and an ASUS Laptop, Model G74S, Serial Number 15G29005501.

A TRUE BILL

FOREPERSON

HENRY C. LEVENTIS
UNITED STATES ATTORNEY


MONICA R. MORRISON
ASSISTANT UNITED STATES ATTORNEY